

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Deborah L. Sawyer
Debtor

Statebridge Company, LLC as servicer
for Wilmington Savings Fund Society,
FSB, d/b/a Christiana Trust as Trustee
for PNPMS Trust III
v.

Deborah L. Sawyer
Jack N. Zaharopoulos
Respondents

CASE NO.: 24-02258-MJC

CHAPTER 13

Judge: Mark J. Conway

Hearing Date:

Objection Deadline:

OBJECTION TO CONFIRMATION OF MODIFIED PLAN

PLEASE TAKE NOTICE that Statebridge Company, LLC as Servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust as Trustee for PNPMS Trust III (“Secured Creditor”), the holder of a mortgage on real property of the Debtor, located at 60 Central Avenue, Wellsboro, PA 16901, by and through its undersigned attorneys, hereby objects to the confirmation of the Modified Chapter 13 Plan on grounds including:

1. Debtor filed a Chapter 13 Plan on October 18, 2024.
2. Debtor’s plan misidentifies Secured Creditor. The correct Secured Creditor is Statebridge Company, LLC as Servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust as Trustee for PNPMS Trust III. Accordingly, the treatment of Creditor’s Claim is unclear in the Chapter 13 Plan.
3. Debtor’s proposed plan is insufficient to provide for the total debt claim of Secured Creditor. The objecting creditor is due payoff of \$21,891.27 plus interest over the life of the plan per Claim 7-1 filed on October 31, 2024.
4. The funding of the Plan is speculative and dependent upon the sale of Debtor’s property purportedly located at “2 Sherman Street, Wellsboro, PA.” Debtor’s proposed plan fails to provide any supporting information or documentation regarding the sale, retaining a broker, listing agreement, etc., and further fails to provide a concrete timeframe for the sale of said property. Moreover, Secured Creditor is without sufficient information to determine whether there is equity in the property sufficient to fund the Plan following sale.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. 1325(a)(4) and 1325(b), *et seq.* unless the plan provides for full payment of the claim.

Dated: November 15, 2024

By: /s/ Lauren Moyer

Lauren Moyer, Esq.

FRIEDMAN VARTOLO LLP

Attorneys for Statebridge Company, LLC as
servicer for Wilmington Savings Fund Society,
FSB, d/b/a Christiana Trust as Trustee for PNPMS
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CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF PLAN

The undersigned counsel for Statebridge Company, LLC as Servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust as Trustee for PNPMS Trust III, (“Secured Creditor”) certify that, on the date stated hereon, I caused to be served a copy of the Objection to Plan filed on behalf of Secured Creditor on the parties in the manner specified on the attached service list.

The type(s) of service made on the parties was: electronic notification or first class mail, postage pre-paid. Where service is by electronic notification, the address of the party is listed for identification purposes only.

EXECUTED ON: November 15, 2024

By: /s/ Lauren Moyer

Lauren Moyer, Esq.

FRIEDMAN VARTOLO LLP

Attorneys for Statebridge Company, LLC as
servicer for Wilmington Savings Fund Society,
FSB, d/b/a Christiana Trust as Trustee for PNPMS
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Service by Regular Mail

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Bankruptcy Debtor

Service by NEF

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